

Honorable Robert S. Lasnik

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

COSTCO WHOLESALE CORPORATION,

Plaintiff,

v.

ARROWOOD INDEMNITY COMPANY,

Defendant.

Civil Action No. 2:17-cv-01212-RSL

STIPULATION MOTION AND
~~PROPOSED~~ ORDER TO CONTINUE
CERTAIN PRETRIAL DEADLINES

Pursuant to LCR 7(d)(1) and LCR 10(g), Plaintiff Costco Wholesale Corporation ("Costco") and Defendant Arrowood Indemnity Company ("Arrowood"), by and through their attorneys of record, hereby submit this Stipulated Motion and [Proposed] Order to Continue Certain Pretrial Deadlines. The parties have met and conferred, and submit this Stipulated Motion in good faith.

DISCUSSION

By its Minute Order Setting Trial Date & Related Dates (ECF No. 13), the Court set this matter for trial on November 5, 2018 and also established a case schedule of pretrial deadlines. To date, the Parties have engaged in substantial written discovery and are in the process of scheduling depositions in this matter. Arrowood has produced all responsive, non-privileged and non-protected documents in its possession. Costco has thus far produced 10 document production sets on a rolling basis and has agreed to continue its production as expeditiously as reasonably possible.

In light of the upcoming pretrial deadlines, the Parties stipulate and jointly move the Court for a continuance of certain pretrial deadlines for purposes of completing depositions and the production of documents by Costco, as follows:

Deadline	Prior Deadline	Proposed Deadline
Last Day to Amend Pleadings	5/9/18	6/20/18
Reports from Expert Witnesses	5/9/18	6/20/18
Discovery Cutoff	7/8/18	8/20/18
Dispositive Motions	8/7/18	9/4/18

The Parties do not request that the Court continue the trial date or any other dates unless specified herein. Accordingly, the Parties respectfully request that this Stipulated Motion be approved and that the Court agree to continue the pretrial deadlines specified herein.

IT IS SO STIPULATED THIS 18th day of April, 2018.

DATED: April 18, 2018

CLYDE & CO US LLP

/s/ Alexander E. Potente

Alexander E. Potente, WSBA #48858

alex.potente@clydeco.us

601 Union Street, Two Union Square, 42nd Floor
Seattle, Washington 98101

Phone (206) 652-3237

Fax (206) 652-3237

Attorneys for Defendant

ARROWOOD INDEMNITY COMPANY

1 DATED: April 18, 2018

PACIFICA LAW GROUP LLP

3 /s/ Paul J. Lawrence

4 Paul J. Lawrence, WSBA #13557

5 Matthew J. Segal, WSBA #29797

6 Nicholas W. Brown, WSBA #33586

1191 Second Avenue, Suite 2000

Seattle, WA 98101

Phone: (206) 245-1700

Fax: (206) 245-1750

Attorneys for Plaintiff

COSTCO WHOLESALE CORPORATION

28 3750606

STIPULATED MOTION AND [PROPOSED] ORDER TO
CONTINUE CERTAIN PRETRIAL DEADLINES (2:17-cv-01212-
RSL) - 3

CLYDE & CO US LLP
601 Union Street, Two Union Square, 42nd Floor
Seattle, Washington 98101
(206) 652-3237

ORDER

IT IS HEREBY ORDERED that this Stipulated Motion to continue certain pretrial deadlines is GRANTED. The new dates for the pretrial deadlines are as follows:

Deadline	Prior Deadline	New Deadline
Last Day to Amend Pleadings	5/9/18	6/20/18
Reports from Expert Witnesses	5/9/18	6/20/18
Discovery Cutoff	7/8/18	8/20/18
Dispositive Motions	8/7/18	9/4/18

All other dates remain the same as set forth in the Court's Minute Order Setting Trial Date & Related Dates (ECF No. 13).

DATED this 19th day of April, 2018.



Honorable Robert S. Lasnik
United States District Judge